

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMALIA ADAMS, et al.,
Plaintiffs,

v.

EXPERIAN INFORMATION SOLUTIONS, INC., et al.,
Defendants.

Case No. 22-cv-10405
Hon. Nancy G. Edmunds
Mag. Kimberly G. Altman

PLAINTIFFS' COUNSEL'S MOTION TO WITHDRAW

NOW COMES Carl Schwartz, counsel for Plaintiffs, and hereby moves this Court for an order allowing him to withdraw as counsel for Plaintiffs in this matter and, in support, state as follows:

Mr. Schwartz relies upon the accompanying brief in support of his motion.

WHEREFORE, Plaintiffs' counsel, Carl Schwartz, requests that this Court enter an order granting his withdrawal as counsel for Plaintiff.

Certification of Counsel

On August 17, 2022, Plaintiffs' counsel contacted the counsels for each of the defendants and each defendant stated that it did not object to the motion.

Plaintiffs' counsel also contacted Plaintiffs on multiple occasions to seek concurrence for the relief requested in this motion. Plaintiffs have not responded to Plaintiff's counsel.

Respectfully submitted,

Dated: August 19, 2022

/s/ Carl Schwartz

CARL SCHWARTZ (P70335)

CREDIT REPAIR LAWYERS OF AMERICA

Attorneys for Plaintiff

39111 Six Mile Road, Suite 142

Livonia, MI 48152

(248) 353-2882

Fax (248) 353-4840

Email – carl@crlam.com

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BRIEF IN SUPPORT OF
PLAINTIFFS' COUNSEL'S MOTION TO WITHDRAW

Plaintiffs retained Credit Repair Lawyers of America to represent them in this action. Mr. Schwartz has appeared in this action on behalf of Plaintiff. However, Plaintiffs and their counsel have experienced a complete breakdown in their relationship that it is not possible for Mr. Schwartz to continue to represent Plaintiffs in this matter. Plaintiffs have not responded to Mr. Schwartz's repeated attempts to communicate with them. Plaintiffs' counsel cannot represent Plaintiffs if Plaintiffs do not communicate with their counsel.

MRPC 1.16 provides that a court may allow an attorney to withdraw from a case if "withdrawal can be accomplished without material adverse effect on the interests of the client" and if "good cause for withdrawal exists." MRPC 1.16(b)(6). In this case, there has been a complete breakdown in the relationship between Plaintiffs and their counsel which has made it impossible for Mr. Schwartz to

continue to represent Plaintiffs in this matter. In addition, withdrawal can be accomplished without material adverse effect on the interests of Plaintiffs, as this case is in its infancy and Plaintiffs will have ample time to retain successor counsel if they choose. Furthermore, Plaintiffs' counsel requests this Court to stay this matter for thirty (30) days to allow Plaintiffs time to retain successor counsel if they choose. Accordingly, Carl Schwartz moves this Court for an order allowing him to withdraw as counsel for Plaintiff.

WHEREFORE, Plaintiffs' counsel, Carl Schwartz, requests that this Court enter an order granting his withdrawal as counsel for Plaintiffs and staying this case for thirty (30) days to allow Plaintiffs time to obtain new counsel if they choose.

Respectfully submitted,

Dated: August 19, 2022

/s/ Carl Schwartz
CARL SCHWARTZ (P70335)
CREDIT REPAIR LAWYERS OF AMERICA
Attorneys for Plaintiff
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Livonia, MI 48152
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Proof of Service

I, Carl Schwartz, hereby state that on August 19, 2022, I served a copy of this motion upon all counsel of record through the Court's CM/ECF system. I further state that this motion has been served to Plaintiffs via first-class mail and email.

/s/ Carl Schwartz